

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al., ¹)	Case No. 22-80860
)	
Debtors.)	Chapter 11
)	
)	Joint Administered

THIRD APPLICATION FOR INTERIM APPROVAL OF FEES AND EXPENSES

COMES NOW Turner Legal Group, LLC (“Applicant”), pursuant to Fed. R. Bank. P. 2016 and Neb. R. Bank. P. 2016-1, 11 U.S.C. § 330, and the Motion to Approve Procedures for Interim Compensation and Reimbursement of Professional Fees previously entered and approved by this Court, the undersigned submits this Third Application for Interim Approval of Fee and Expense for Debtors’ Counsel.

BACKGROUND

1. On November 21, 2022, (the “Petition Date”), Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. This Court has jurisdiction over this case pursuant to 28 U.S.C. §1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. No party has requested the appointment of a trustee or examiner in the Chapter 11 Cases, and no committees have been appointed or designated.

2. On November 23, 2022, Debtors filed their *Motion To Approve Procedures For Interim Compensation And Reimbursement Of Professional Fees* at Filing No. 17, which motion was approved by this Court on December 28, 2022, at Filing No. 71 (the “Procedures”).

3. On May 17, 2023, Applicant filed its Application for Interim Approval of Fee and Expenses (the “First Application”). Filing No. 197. On July 6, 2023, the Court entered an Order approving the First Application awarding fees of \$60,412.00 and expenses of \$1,889.94. Of this amount, \$32,193.00 in fees and \$0.00 in expenses remain outstanding. Applicant possesses \$52,994.00 in trust.

4. On October 25, 2023, Applicant filed its Second Application for Interim Approval of Fee and Expenses (the “Second Application”) seeking fee in the amount of \$31,968.50 and expenses of \$538.74. The Second Application remains outstanding.

5. In accordance with the Procedure, Applicant submits this Third Application for Interim Approval of Fee and Expenses of Attorney’s Fees and Expenses of actual and necessary costs and expenses incurred by Applicant as Counsel to Debtors from July 1, 2023, to September 30, 2023 (the “Period”).

6. Applicant was employed by Debtors on an hourly basis for the purpose of representing Debtors in the conduct of these Chapter 11 Case and its business affairs. Applicant was employed to perform all services as were necessary or reasonable for and on behalf of Debtors on an hourly basis, with no budget or limitation being imposed upon services rendered or fees incurred in connection therewith.

7. The names and hourly rates of all of Applicant’s attorneys, paralegals and legal assistants who billed time with respect to this case are as set forth on Exhibit “A”, as attached hereto and by this reference incorporated herein. The hourly rates reflected on Exhibit “A” are the customary and standard hourly rates for

such attorneys, paralegals and legal assistants. The average hourly rate charged by Applicant to Debtors during the Period ranges between \$100.00/h to \$310.00/h.

8. Attached hereto as Exhibit “A” is a break-down by project code that includes the numbers of hours spent by Applicant per ABA Bankruptcy Code project categories. Copies of applicable invoices are set forth on Exhibit “B” attached hereto.

9. All services for which compensation is requested by Applicant were performed for and on behalf of Debtors and not on behalf of any other person. The services rendered by Applicant in this case were necessary and have aided in the collection, preservation, and sale of the assets of the estates, and the orderly administration thereof.

10. The reasonable value of the services rendered by Applicant as counsel for Debtors in this Chapter 11 case during the Period is \$36,332.50. Of this amount, \$36,332.50 remains outstanding.

11. Applicant has expended the sum of \$349.32 for actual and necessary costs and expenses incurred by Applicant as counsel to Debtors during the Period. Of this amount \$349.32 remains outstanding.

12. Set forth on Exhibit “A” is a detailed listing of Applicant’s out-of-pocket expenses incurred with reference to this case.

CASE STATUS

13. The Plans and Disclosure Statements have not yet been filed in this case. Debtors intend to file multiple plans and disclosure statements following the sale process described below.

14. To the best of Applicant’s knowledge, all UST Quarterly Fees are current and all Monthly Operating Reports have been filed.

15. On February 6, 2023, Debtors filed there: (i) *Motion For Order Approving Bidding Procedures To Be Used In Relation To The Proposed Sale Of Debtors Assets* (Filing No. 130) (the “Procedures Motion”); and (ii) their *Motion For Order Pursuant To 11 U.S.C. §§ 105(a) and 365 And fed. R. Bank p. 6006 Authorizing And Approving Procedures Governing The Assumption And Assignment Of Executory Contracts And Unexpired Leases* (Filing No. 131) (the “Assumption Motion”).

16. The Assumption Motion was approved by Order of the Court on March 10, 2023. Filing No. 154. The Procedures Motion was approved by Order of the Court on March 10, 2023. Filing No. 161.

17. During this time, Debtors’ Financial Advisor, B. Riley Advisory Services, has undertaken a substantial marketing process that is generating substantial interest in Debtors’ assets as a going concern.² As things stand, the sale process remains ongoing and Debtors are speaking with multiple parties interested in purchase some or all of Debtors’ assets. Following this sale process, Debtors intend to file one or more plans of reorganization and disclosure statements.

18. At the same time, Debtors retained the services of Paul Land and Plaza Commercial Realty to act as a licensed real estate broker to market the assets of Wilcox Properties of Columbia, LLC (“Columbia”). On September 8, 2023, Debtors filed their Amended Motion to Sell (Filing No. 254) in which Debtors sought permission to sell certain assets of Columbia to a third party (the “Sale Motion”). On October 13, 2023, the Court entered an Order granting the Sale Motion and Debtors anticipate closing this sale within the next 21 days.

² B. Riley is not, however, actively marketing the assets of Wilcox Properties of Columbia, LLC.

CONCLUSION

19. Applicant requests that the Court approve this fee application pursuant to 11 U.S.C. §330 as fees and expenses which were reasonable, actual and necessary to the administration of the bankruptcy estates.

WHEREFORE, Debtors respectfully request that the Court enter an order: (a) granting this motion; (b) approving compensation in the amount of \$36,332.50 and approving expenses in the amount of \$349.32; and (c) granting such other and further relief as is just and proper.

Dated this 25th day of October, 2023.

By: /s Patrick Turner
Patrick R. Turner (#23461)
Turner Legal Group, LLC
14707 California Street, #1
Omaha, NE 68154
Tel: 402-690-3675
pturner@turnerlegalomaha.com

Counsel for Debtors.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al.,)	Case No. 22-80860
)	
Debtors.)	Chapter 11, Joint Administered

**Exhibit "A"
SUMMARY SHEET**

1. Total Compensation and Expenses Currently Requested in this Application.
 - a. Fees – \$36,332.50
 - b. Expenses – \$349.32

2. Total Compensation and Expenses Previously Requested (Petition Date through June 30, 2023).
 - a. Fees - \$92,380.50
 - b. Expenses – \$2,428.68

3. Total Compensation and Expenses Previously Awarded by the Court
 - a. Fees – \$60,412.00
 - b. Expenses – \$1,889.94

4. Name and Current Billing Rate for each person who billed time during period, total hours billed, average billing rate, and total fees billed:

Timekeeper Name	Role	Work Hours	Work Rate	Work Amount
Turner, Patrick R	Attorney	114.50	\$310.00	\$35,495.00
Jenna Taylor	Paralegal	6.7	\$125.00	\$837.50
Total		121.20		\$36,332.50

5. Detailed listing of Applicant's out-of-pocket expenses incurred with reference to this case:

Work Date	Cost Type	Amount
9/19/2023	Printing and Postage	\$349.32

6. Project Codes.

Task-Code	Task	Work Hours	Work Amount
B110	B110 Case Administration.	2.9	\$399.50
B130	B130 Asset Disposition.	70.7	\$21,917.00
B140	B140 Relief from Stay/Adequate Protection Proceedings.	4.0	\$1,240.00
B160	B160 Fee/Employment Applications.	4.0	\$500.00
B210	B210 Business Operations.	38.9	\$12,059.00
B310	B310 Claims Administration and Objections.	.7	\$217.00
Total		121.20	\$36,332.50

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re Dimensions In Senior Living, LLC et al.,)	Case No. 22-80860
)	
Debtors.)	Chapter 11
)	
)	Joint Administered

Exhibit "C"

INVOICES

Turner Legal Group, LLC

INVOICE

139 S. 144TH STREET
#665
Omaha, 68010
pturner@turnerlegalomaha.com
<https://turnerlegalomaha.com/>
O: (402) 690-3675

Number	595
Issue Date	8/24/2023
Due Date	9/23/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 7/3/2023 B210. Reviewing Columbia property report.	Patrick Turner	\$310.00	0.50	\$155.00
Time 7/4/2023 B160. Categorization of Time Entries for June. Billed by Jenna Taylor.	Patrick Turner	\$125.00	0.20	\$25.00
Time 7/4/2023 B110. Review of Docket Sheet. Billed by Jenna Taylor.	Patrick Turner	\$125.00	0.20	\$25.00
Time 7/4/2023 B160. Initial gathering of information for the Erickson Sederstrom First Interim Fee Application. Billed by Jenna Taylor.	Patrick Turner	\$125.00	0.50	\$62.50
Time 7/5/2023 B210. Reviewing and addressing revised MORs.	Patrick Turner	\$310.00	1.30	\$403.00
Time 7/6/2023 B210. Reviewing and addressing May MORs.	Patrick Turner	\$310.00	2.20	\$682.00
Time 7/6/2023 B210. Addressing John Deere claim issues.	Patrick Turner	\$310.00	0.40	\$124.00
Time 7/7/2023 B140. Status call with Mr. Biehl.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/9/2023 B160. Drafting of Erickson Sederstrom First Interim Fee Application. Billed by Jenna Taylor.	Patrick Turner	\$125.00	1.00	\$125.00
Time 7/9/2023 B160. Drafting of Turner Legal Group Second Interim Fee Application. Billed by Jenna Taylor.	Patrick Turner	\$125.00	1.00	\$125.00
Time 7/11/2023 B140. Addressing APA.	Patrick Turner	\$310.00	2.90	\$899.00

Time Entries	Document	Rate	Hours	Sub
Time 7/11/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/11/2023 B210. Reviewing Columbia loan documents re Gross claim.	Patrick Turner	\$310.00	0.80	\$248.00
Time 7/11/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.80	\$248.00
Time 7/11/2023 B140. Status call with Mr. Peil.	Patrick Turner	\$310.00	0.60	\$186.00
Time 7/12/2023 B210. Status call with Mrs. Burns.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/12/2023 B140. Status call with Mr. Zluticky.	Patrick Turner	\$310.00	0.10	\$31.00
Time 7/12/2023 Addressing possible critical vendor demand from Fast Wyre.	Patrick Turner	\$310.00	0.50	\$155.00
Time 7/12/2023 B210. Addressing status issues with Columbia sale and analyzing options to liquidate assets.	Patrick Turner	\$310.00	0.60	\$186.00
Time 7/13/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.20	\$62.00
Time 7/13/2023 B140. Status call with Mr. Peil.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/13/2023 B140. Conference call with DISL and Mr. Peil.	Patrick Turner	\$310.00	0.70	\$217.00
Time 7/13/2023 B140. Status call with Mr. Peil and bank attorneys re sale process.	Patrick Turner	\$310.00	1.00	\$310.00
Time 7/13/2023 B140. Addressing notice of changes to bidding procedures.	Patrick Turner	\$310.00	0.50	\$155.00
Time 7/13/2023 B210. Addressing Gross lawsuit and options to prevent harm to Debtors.	Patrick Turner	\$310.00	0.90	\$279.00
Time 7/17/2023 B210. Addressing Gross lawsuit and impact of standby agreement.	Patrick Turner	\$310.00	0.80	\$248.00
Time 7/19/2023 B210. Status call with Ms. Taylor.	Patrick Turner	\$310.00	0.20	\$62.00

Time Entries	Document	Rate	Hours	Sub
Time 7/19/2023 B210. Addressing status and review of ANB forbearance documents and changes.	Patrick Turner	\$310.00	0.70	\$217.00
Time 7/19/2023 B210. Reviewing and summarizing Debtor loan documents for assumption of loan discussions.	Patrick Turner	\$310.00	0.90	\$279.00
Time 7/19/2023 B210. Addressing Gross lawsuit and standby agreement impact on same.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/20/2023 B140. Addressing Champions inquiry into bidding procedures changes.	Patrick Turner	\$310.00	0.20	\$62.00
Time 7/20/2023 B140. Addressing inquires into status of Columbia re from Ms. Burns.	Patrick Turner	\$310.00	0.40	\$124.00
Time 7/21/2023 B140. Reviewing status updates for sale process.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/21/2023 B210. Reviewing ANB calculations for Columbia payments.	Patrick Turner	\$310.00	0.40	\$124.00
Time 7/24/2023 B130. Addressing Columbia adequate protection calculation and loan document review.	Patrick Turner	\$310.00	0.80	\$248.00
Time 7/24/2023 B210. Status call with Ms. Taylor.	Patrick Turner	\$310.00	0.20	\$62.00
Time 7/24/2023 B110. Review and Revisions as needed to June Operating Reports. Billed by Jenna Taylor.	Patrick Turner	\$125.00	1.20	\$150.00
Time 7/25/2023 B210. Addressing case status update.	Patrick Turner	\$310.00	0.20	\$62.00
Time 7/25/2023 B210. Addressing inspection request from Berkadia.	Patrick Turner	\$310.00	0.50	\$155.00
Time 7/25/2023 B130. Addressing Columbia adequate protection calculation and Bank revisions.	Patrick Turner	\$310.00	0.30	\$93.00
Time 7/26/2023 B110. Continuation on review and revisions to remaining June Operating Reports. Billed by Jenna Taylor.	Patrick Turner	\$125.00	1.30	\$162.50
Time 7/26/2023 B210. Addressing Berkadia inspection issues.	Patrick Turner	\$310.00	0.50	\$155.00

Time Entries

Document

Biller's Page

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Rate

Hours

Sub

Time 7/26/2023 B210. Reviewing E&S fee application.	Patrick Turner	\$310.00	0.60	\$186.00
Time 7/26/2023 B210. Reviewing MORs.	Patrick Turner	\$310.00	0.90	\$279.00
Time 7/27/2023 B140. Analyzing and addressing revised proposal re Columbia sale.	Patrick Turner	\$310.00	0.60	\$186.00
Time 7/27/2023 B160. Drafting of Erickson Sederstrom June Monthly Fee Application including exhibits and categorization of time entries. Billed by Jenna Taylor.	Patrick Turner	\$125.00	1.00	\$125.00
Time 7/27/2023 B160. Drafting of Turner June Monthly Fee Application. Billed by Jenna Taylor.	Patrick Turner	\$125.00	0.30	\$37.50
Time 7/28/2023 B140. Continuing to address Columbia sale issues and terms.	Patrick Turner	\$310.00	0.40	\$124.00
Time 7/28/2023 B140. Call with Mr. Land re Columbia sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 7/31/2023 B210. Status call with ANB and Mr. Heiman re forbearance agreement.	Patrick Turner	\$310.00	0.50	\$155.00

Time Entries
Total

31.80

\$8,618.50

Total (USD)

\$8,618.50

Paid

\$0.00

Balance

\$8,618.50

Turner Legal Group, LLC

INVOICE

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Number	605
Issue Date	9/20/2023
Due Date	10/20/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 8/1/2023 B140. Review and analysis of new Columbia marketing proposal and plan.	Patrick Turner	\$310.00	0.80	\$248.00
Time 8/1/2023 B140. Reviewing additional due diligence materials re buyers requests.	Patrick Turner	\$310.00	0.90	\$279.00
Time 8/2/2023 B140. Status call with Mr. Zluticky .	Patrick Turner	\$310.00	0.20	\$62.00
Time 8/2/2023 B140. Continuing review and analysis of new Columbia marketing proposal and plan.	Patrick Turner	\$310.00	0.50	\$155.00
Time 8/2/2023 B140. Addressing correspondence from Mr. Peil re additional due diligence issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 8/3/2023 B130. Addressing CC stipulation and budget needs.	Patrick Turner	\$310.00	0.50	\$155.00
Time 8/3/2023 B140. Reviewing finalized and send Columbia sale package.	Patrick Turner	\$310.00	0.40	\$124.00
Time 8/3/2023 B140. Reviewing additional sale due diligence materials.	Patrick Turner	\$310.00	0.40	\$124.00
Time 8/3/2023 B210. Reviewing ANB requested forbearance agreements.	Patrick Turner	\$310.00	0.50	\$155.00
Time 8/3/2023 B210. Addressing Columbia insurance premium payment issues.	Patrick Turner	\$310.00	0.40	\$124.00
Time 8/4/2023 B140. Addressing status of Columbia sale.	Patrick Turner	\$310.00	0.20	\$62.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 8/7/2023 B210. Call with USDOL re retirement programs.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/7/2023 B210. Continuing to address Columbia notice of insurance cancellation.		Patrick Turner	\$310.00	0.40	\$124.00
Time 8/7/2023 B210. Review and analysis of Columbia sale update information.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/7/2023 B210. Reviewing and analyzing Columbia insurance claim documents.		Patrick Turner	\$310.00	1.10	\$341.00
Time 8/7/2023 B140. Status call with Mr. Biehl.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/7/2023 B140. Status call with Mr. Knickrehm and Mr. Biehl.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/7/2023 B130. Addressing Columbia budget issues and CC stipulation.		Patrick Turner	\$310.00	0.50	\$155.00
Time 8/8/2023 B140. Status call with Mr. Peil and Mr. Zluticky.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/8/2023 B140. Status call with Mr. Peil re sale.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/8/2023 B140. Meeting with investment broker for potential asset buyer.		Patrick Turner	\$310.00	0.50	\$155.00
Time 8/8/2023 B210. Addressing insurance payment logistics.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/8/2023 B210. Reviewing Berkadia information request.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/8/2023 B210. Reviewing Columbia Insurance claim documents including reports and repaid estimates.		Patrick Turner	\$310.00	1.20	\$372.00
Time 8/14/2023 B210. Status call with Mr. Heiman re Columbia property issues.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/14/2023 B210. Status call with Mr. Grazier re ERC program.		Patrick Turner	\$310.00	0.10	\$31.00
Time 8/14/2023 B210. Addressing June MORs.		Patrick Turner	\$310.00	1.50	\$465.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 8/14/2023 B210. Continuing to review Columbia insurance claim issues and correspondence re possible lawsuit.		Patrick Turner	\$310.00	0.60	\$186.00
Time 8/14/2023 B130. Addressing Columbia CC issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/14/2023 B140. Addressing Columbia sale process and offer inquiries.		Patrick Turner	\$310.00	0.40	\$124.00
Time 8/15/2023 B210. Status call with Ms. Taylor.		Patrick Turner	\$310.00	0.10	\$31.00
Time 8/15/2023 B210. Status call with Mr. Grazier re ERC program.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/16/2023 B210. Addressing collection company inquiry re notice.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/16/2023 B140. Addressing Berkadia inquiries for credit bid purposes.		Patrick Turner	\$310.00	0.80	\$248.00
Time 8/17/2023 B140. Reviewing potential bidder correspondence and inquires and addressing bidding deadline changes.		Patrick Turner	\$310.00	0.70	\$217.00
Time 8/17/2023 B210. Research into ERTC program.		Patrick Turner	\$310.00	0.60	\$186.00
Time 8/17/2023 B140. Status call with Mr. Peil re sale.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/18/2023 B140. Addressing changes to bidding procedures and correspondence with UST and lenders' counsel re same		Patrick Turner	\$310.00	0.70	\$217.00
Time 8/18/2023 B130. Addressing Columbia budget and CC issues.		Patrick Turner	\$310.00	0.50	\$155.00
Time 8/21/2023 B130. Addressing ANB third cash collateral order.		Patrick Turner	\$310.00	0.90	\$279.00
Time 8/21/2023 B140. Addressing change notice to bidding procedures.		Patrick Turner	\$310.00	0.40	\$124.00
Time 8/21/2023 B210. Continuing to address ERTC program research and related issues.		Patrick Turner	\$310.00	0.60	\$186.00
Time 8/22/2023 B140. Reviewing sale offers for Columbia.		Patrick Turner	\$310.00	0.90	\$279.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 8/22/2023 B140. Call with Mr. Whaley re FC sale issues.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/23/2023 B210. Continuing to review and assess possible bad faith claims re Columbia insurance claim.		Patrick Turner	\$310.00	0.90	\$279.00
Time 8/23/2023 B140. Status call with Mr. Land re Columbia sale.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/23/2023 B140. Status call with Mr. Land.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/23/2023 B140. Status call with Mr. Heiman and Ms. Burns re Columbia issues.		Patrick Turner	\$310.00	0.40	\$124.00
Time 8/24/2023 B140. Continuing revisions to model APA for sale.		Patrick Turner	\$310.00	1.50	\$465.00
Time 8/24/2023 B210. Review and analysis of correspondence to and from Mr. Heiman re Columbia insurance claim.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/24/2023 B210. Addressing creditor request for address notice change.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/25/2023 B140. Continuing revisions to DISL model APA.		Patrick Turner	\$310.00	2.90	\$899.00
Time 8/28/2023 B140. Reviewing and assessing revisions to model APA.		Patrick Turner	\$310.00	1.60	\$496.00
Time 8/29/2023 B140. Addressing Columbia sale motion.		Patrick Turner	\$310.00	1.80	\$558.00
Time 8/29/2023 B140. Addressing NEDCO inquiry re sale process.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/29/2023 B140. Call with Mr. Whaley re FC sale issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 8/29/2023 B210. Continuing to addressing possible insurance company claims and reviewing BK jurisdictional issues re venue.		Patrick Turner	\$310.00	0.80	\$248.00
Time 8/30/2023 B210. Reviewing ombudsman reports.		Patrick Turner	\$310.00	0.90	\$279.00
Time 8/30/2023 B140. Continuing revisions to APA.		Patrick Turner	\$310.00	2.90	\$899.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 8/30/2023 B140. Addressing Columbia closing issues.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/31/2023 B140. Addressing Columbia sale motion and reviewing related service needs.		Patrick Turner	\$310.00	2.20	\$682.00
Time 8/31/2023 B140. Status call with Mr. Peil re sale process.		Patrick Turner	\$310.00	0.30	\$93.00
Time 8/31/2023 B210. Addressing ANB lawsuit against Debtors' guarantors.		Patrick Turner	\$310.00	0.90	\$279.00
Time Entries Total				39.70	\$12,307.00

Total (USD)	\$12,307.00
Paid	\$0.00
Balance	\$12,307.00

Turner Legal Group, LLC

INVOICE

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#665
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pturner@turnerlegalomaha.com
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O: (402) 690-3675

Number	613
Issue Date	10/10/2023
Due Date	11/9/2023
Email	amyburns@dimslvg.com

Bill To:

Amy Wilcox-Burns
O: (402) 898-1079

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Time 9/1/2023 B230. Addressing ANB cash collateral order.	Patrick Turner	\$310.00	0.40	\$124.00
Time 9/1/2023 B130. Call with Ms. Appleby re Berkley bid issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/1/2023 B130. Status call with ANB counsel re sale process.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/4/2023 Reviewing Columbia property title commitment.	Patrick Turner	\$310.00	0.50	\$155.00
Time 9/5/2023 B130. Addressing Columbia sale motion and related pleadings.	Patrick Turner	\$310.00	1.20	\$372.00
Time 9/5/2023 B210. Addressing creditor inquiry into status of Village Place bankruptcy.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/6/2023 B130. Addressing status of Columbia closing.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/6/2023 B210. Addressing ANB lawsuit re guarantor liability and addressing inquiry from Debtors re same.	Patrick Turner	\$310.00	0.40	\$124.00
Time 9/6/2023 B130. Finalizing and addressing Motion to Sell and Motion to Limit Notice re Columbia sale.	Patrick Turner	\$310.00	3.90	\$1,209.00
Time 9/6/2023 B130. Addressing and analyzing Berkley stalking horse offer proposal.	Patrick Turner	\$310.00	1.10	\$341.00
Time 9/6/2023 B210. Status call with Mr. Heiman re Columbia insurance claims.	Patrick Turner	\$310.00	0.70	\$217.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 9/6/2023 B130. Status call with Mr. Heiman re sale process.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/6/2023 B130. Addressing Sale Motion procedural issues with BK court.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/6/2023 B130. Addressing Sale Motion procedural issues with BK court.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/7/2023 B130. Addressing possible dispute over asset inclusion re Columbia sale.		Patrick Turner	\$310.00	0.60	\$186.00
Time 9/7/2023 B130. Addressing revisions to Model APA for sale process.		Patrick Turner	\$310.00	0.90	\$279.00
Time 9/7/2023 B310. Addressing		Patrick Turner	\$310.00	0.30	\$93.00
Time 9/7/2023 B210. Addressing inquiry re jurisdiction of BK court to address insurance claim issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/8/2023 B130. Addressing Sale Motion procedural issues with BK court.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/8/2023 B130. Resolving asset inclusion dispute re Columbia sale.		Patrick Turner	\$310.00	0.40	\$124.00
Time 9/8/2023 B210. Addressing MOR issues.		Patrick Turner	\$310.00	1.40	\$434.00
Time 9/8/2023 Status call with Mr. Jacobs.		Patrick Turner	\$310.00	0.80	\$248.00
Time 9/8/2023 B130. Addressing amended sale motion.		Patrick Turner	\$310.00	0.60	\$186.00
Time 9/11/2023 B130. Addressing Sale Motion procedural issues with BK court.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/12/2023 B130. Beginning analysis of Berkely offer.		Patrick Turner	\$310.00	0.80	\$248.00
Time 9/12/2023 B210. Addressing ERTC claim issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/13/2023 B210. Status call re ERTC program and eligibility.		Patrick Turner	\$310.00	0.40	\$124.00

Time Entries	Document	Billable By	Rate	Hours	Sub
Time 9/13/2023 B230. Addressing ANB cash collateral stipulation.		Patrick Turner	\$310.00	0.80	\$248.00
Time 9/13/2023 B130. Continuing analysis of Berkley bid letter and Mr. Peil's analysis of same.		Patrick Turner	\$310.00	0.80	\$248.00
Time 9/14/2023 B130. Preparing for and participating in conference call with Berkley working group re sale process.		Patrick Turner	\$310.00	1.00	\$310.00
Time 9/14/2023 B210. Status call with Mr. Biehl re DISL strategy.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/14/2023 B130. Call with Mr. Zluticky re sale process and bid issues.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/14/2023 B130. Addressing broker inquiry into status of Columbia closing.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/14/2023 B210. Status call with Mr. Heiman re Columbia insurance claims.		Patrick Turner	\$310.00	0.40	\$124.00
Time 9/14/2023 B210. Continuing to address claims against insurance company re Col		Patrick Turner	\$310.00	0.40	\$124.00
Time 9/14/2023 B210. Status call with Ms. Burns re case issues.		Patrick Turner	\$310.00	0.30	\$93.00
Time 9/14/2023 B130. Status call with Mr. Whaley re sale process.		Patrick Turner	\$310.00	0.10	\$31.00
Time 9/15/2023 B130. Addressing bank payoff calculations for possible credit bids.		Patrick Turner	\$310.00	0.40	\$124.00
Time 9/15/2023 B130. Status call with Mr. Whaley re sale process.		Patrick Turner	\$310.00	0.20	\$62.00
Time 9/15/2023 B210. Call with Mr. Heiman and Mr. Orr re insurance dispute re Columbia sale.		Patrick Turner	\$310.00	0.90	\$279.00
Time 9/18/2023 B130. Continuing to addressing DISL sale logistics.		Patrick Turner	\$310.00	0.90	\$279.00
Time 9/18/2023 B130. Status call with ANB counsel re sale process.		Patrick Turner	\$310.00	0.40	\$124.00
Time 9/18/2023 B130. Addressing Columbia sale notice issues.		Patrick Turner	\$310.00	0.30	\$93.00

Time Entries	Document	Rate	Hours	Sub
Time 9/18/2023 B130. Call with Ms. Appleby re Berkley bid issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/19/2023 B130. Continuing to address bidder negotiations and sale issues.	Patrick Turner	\$310.00	1.20	\$372.00
Time 9/19/2023 B210. Addressing Orr and Horgan retention issues.	Patrick Turner	\$310.00	0.70	\$217.00
Time 9/20/2023 B310. Addressing claim inquiry from Unimovers.	Patrick Turner	\$310.00	0.40	\$124.00
Time 9/21/2023 B110. Addressing attorney retention terms.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/21/2023 B130. Reviewing Berkley APA changes.	Patrick Turner	\$310.00	2.90	\$899.00
Time 9/21/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/21/2023 B130. Addressing sale status with Mr. Peil.	Patrick Turner	\$310.00	0.40	\$124.00
Time 9/22/2023 B210. Status call with Mr. Heiman.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/22/2023 B130. Beginning review of Berkley bid package and related documents.	Patrick Turner	\$310.00	2.80	\$868.00
Time 9/22/2023 B130. Continuing to review and address additional bid proposals.	Patrick Turner	\$310.00	0.80	\$248.00
Time 9/22/2023 B130. Status call with Mr. Biehl re sale issues.	Patrick Turner	\$310.00	0.10	\$31.00
Time 9/22/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/25/2023 B130. Addressing Columbia buyer concerns re property condition.	Patrick Turner	\$310.00	0.50	\$155.00
Time 9/25/2023 B130. Addressing bid submission issues and bank updates.	Patrick Turner	\$310.00	0.90	\$279.00
Time 9/25/2023 B130. Preparing for and participating in conference call with Debtors re sale process.	Patrick Turner	\$310.00	0.90	\$279.00
Time 9/25/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.30	\$93.00

Time Entries	Document	Rate	Hours	Sub
Time 9/26/2023 B210. Assessing and addressing Fannie Mae appraiser questions.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/26/2023 B130. Preparing for and participating in conference call with Mr. Zluticky re sale process.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/26/2023 B130. Addressing bidder inquiry re sale process and status.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/26/2023 B210. Reviewing Unimovers claim issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/26/2023 B210. Continuing to assess and address Buyer concerns over Columbia status.	Patrick Turner	\$310.00	0.50	\$155.00
Time 9/26/2023 B130. Preparing for and participating in conference call with Bank lawyers re sale process.	Patrick Turner	\$310.00	0.60	\$186.00
Time 9/26/2023 B130. Call with Berkley counsel re sale process.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/26/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/26/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/26/2023 B210. Reviewing status of insurance renewals.	Patrick Turner	\$310.00	0.10	\$31.00
Time 9/27/2023 B130. Reviewing and addressing additional buyer interest and possible bids.	Patrick Turner	\$310.00	1.10	\$341.00
Time 9/27/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.50	\$155.00
Time 9/27/2023 B210. Addressing UST inquiries re fees and insurance status.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/27/2023 B130. Addressing Berkley claim and auction issues related to same.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/28/2023 B130. Status call with Mr. Biehl re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/28/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00

Time Entries	Billed By	Rate	Hours	Sub
Time 9/28/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/28/2023 B130. Call with Title Company re Columbia sale.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/28/2023 B130. Addressing response to Fannie Mae credit bid.	Patrick Turner	\$310.00	0.40	\$124.00
Time 9/28/2023 B130. Addressing status of sale offers with correspondence to and from Mr. Peil re same.	Patrick Turner	\$310.00	0.70	\$217.00
Time 9/28/2023 B130. Addressing Columbia title issues and sale order to address same.	Patrick Turner	\$310.00	1.80	\$558.00
Time 9/29/2023 B210. Addressing Columbia insurance claim subpoenas.	Patrick Turner	\$310.00	1.30	\$403.00
Time 9/29/2023 B130. Addressing modifications to sale process timeline.	Patrick Turner	\$310.00	0.90	\$279.00
Time 9/29/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.50	\$155.00
Time 9/29/2023 B130. Call with Mr. Cali re Fannie loan issues.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/29/2023 B130. Addressing analysis of Fannie credit bid and correspondence to Mr. Zluticky re same.	Patrick Turner	\$310.00	0.30	\$93.00
Time 9/29/2023 B130. Status call with Mr. Biehl re sale issues.	Patrick Turner	\$310.00	0.20	\$62.00
Time 9/29/2023 B130. Status call with Mrs. Burns re sale process.	Patrick Turner	\$310.00	0.10	\$31.00
Time 9/29/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.10	\$31.00
Time 9/29/2023 B130. Status call with Mr. Peil re sale issues.	Patrick Turner	\$310.00	0.10	\$31.00
Time Entries Total			49.70	\$15,407.00

Expenses

Expenses	Billed By	Price	Qty	Sub
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Copying	Document	Page 21 of 21	\$349.32	1.00	\$349.32
9/19/2023					
Postage and Copy.					

Expenses Total:	1.00	\$349.32
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Total (USD)	\$15,756.32
Paid	\$0.00
Balance	\$15,756.32